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To: Mail Stop Appeal Brief - Patents
Exam. KARLS, Shay Lynn, GAU: 1744
Fax No.: (571) 273-8300
From: George M. Macdonald
Date: October 22, 2007
Subject: Serial No.: 10/707,470
Pages: 22 (including this cover)

Re: U.S. Patent Application Serial No.: 10/707,470
Confirmation No. 1469
Our Docket # F-670

Enclosed please find Appellants' Brief on Appeal in the above referenced application.

CERTIFICATION OF FACSIMILE TRANSMISSION

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1. Appellants' Brief on Appeal (21 pages)..

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Serial No.: 10/707,470
Attorney Docket No.: F-670

Patent

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BOARD OF PATENT APPEALS AND INTERFERENCES

In re patent application of:
James A. Hough, et al.

) Attorney Docket No.: F-670
) Customer No.: 00919
) Examiner: Shay L. KARLS
) Group Art Unit: 1744
)
) Date: October 22, 2007

Serial No.: 10/707,470
Filed: December 16, 2003
Confirmation # 1469

Title: OPTICAL SENSOR CLEANER

Mail Stop Appeal Brief- Patents
Commissioner for Patents
Alexandria, VA 22313-1450

APPELLANTS' BRIEF ON APPEAL

Sir:

This is an appeal pursuant to 35 U.S.C. § 134 and 37 C.F.R. §§ 41.31 et seq. from the final rejection of claims 1-15 and 17-21 of the above-identified application mailed May 21, 2007. This Brief is in furtherance of the Notice of Appeal transmitted in this case on August 21, 2007. Accordingly, this brief is timely filed. The fee for submitting this Brief is \$510.00 (37 C.F.R. § 1.17(c)). Please charge Deposit Account No. **16-1885** in the amount of \$510.00 to cover these fees. The Commissioner is hereby authorized to charge any additional fees that may be required for this appeal or to make this brief timely or credit any overpayment to Deposit Account No. **16-1885**.

CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office, on October 22, 2007 (Date of Transmission).
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(Signature)

October 22, 2007 (Date)

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1/21 October 22, 2007 Appellants' Appeal Brief

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Patent

I. Real Party in Interest

The real party in interest in this appeal is Pitney Bowes Inc., a Delaware corporation, the assignee of this application.

II. Related Appeals and Interferences

There are no appeals or interferences known to Appellant, his legal representative, or the assignee that will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. Status of Claims

Claims 1-15 and 17-21 are in the case and under final rejection of the Examiner.

Claim 16 is canceled without prejudice or disclaimer.

Claims 1-3, 5, 7-8, 10, 15 and 21 are in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Claim 4 is in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 6,353,233 to Kikuchi, et al. ("Kikuchi '233").

Claim 6 is in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Claims 9, 13-14 and 17 are in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Claims 11-12 are in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Claim 18 is in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent

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No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 5,457,843 to Gelardi, et al. ("Gelardi '843").

Claim 19 is in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 4,055,029 to Kalbow ("Kalbow '029").

Claim 20 is in the case and under final rejection of the Examiner and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Appellants hereby appeal the final rejection of claims 1-15 and 17-21.

IV. Status of Amendments

There are no amendments to the claims filed subsequently to the Final Office Action of May 21, 2007. Therefore, the claims set forth in Appendix A to this brief are those as set forth before the final rejection.

V. Summary of Claimed Subject Matter

Appellants' invention as presently claimed relates generally to optical sensor cleaners for cleaning debris from optical sensors located in a system including a paper feed path with rollers. See Specification at ¶¶ 0001-0007.

An illustrative embodiment is described with reference to FIG. 2A showing a perspective view of an illustrative embodiment of an optical sensor cleaner for use in a system having a feed path. See Specification at ¶¶ 0015-0026.

Independent claim 1 recites:

1. A cleaning apparatus for cleaning non-contact optical sensors in a paper handling device comprising:
 - a substrate sheet for feeding through a feed path of the paper handling device having a first surface and a second surface and having a substrate thickness, wherein the first surface has a front edge, a rear edge, a left edge and a right edge;
 - a first strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the first strip will vertically compress when drawn through a

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roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path;

a second strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the second strip will vertically compress when drawn through a roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path; and, wherein,

the first strip is separated from the second strip in the direction of the feed path by a first distance; and

the first strip height is relatively large compared to the substrate thickness and the first strip height when partially decompressed is sufficiently large to extend below the feed path to engage the optical sensors.

Referring to FIG. 2A shown here, the illustrative optical sensor cleaner includes a sheet substrate 110 that is 0.0625 inches in thickness E comprising ABS material and is 8.5 inches in the major edge and 5 inches in the minor edge. Cleaning strips 112, 114, 116, 118 and 119 include lint-free, lead-free, non-abrasive, open cell foam attached to the substrate 110 using a permanent adhesive. The substrate 110 has a leading section and a trailing section F that is 1 inch in the major edge direction A. The height B of the foam cleaning strips is 0.75 inches. The foam strips are 0.5 inches wide C and are evenly spaced by distance D. As shown, bristles 117 are used on top of strip 118 and handle 101 is provided on the substrate. Other alternatives are described including three cleaning strips that are evenly spaced 2.5 inches apart on a substrate having a one-inch lead space and a one-inch trailing space. See Specification at ¶¶ 0015-0026.

As the optical sensor cleaner is fed through the paper path, the strips compress through the roller. As each strip begins to exit the roller, the strip immediately expands to contact the sensor, thereby wiping the sensor clean. The open cell foam strips have a width of approximately one half inch and are spaced apart approximately two and one half inches on the substrate. In a preferred embodiment, the cleaning strips include open cell foam because it will more quickly return to its expanded height as it exits from the transport rollers than would closed-cell foam. See Specification at ¶¶ 0015-0016.

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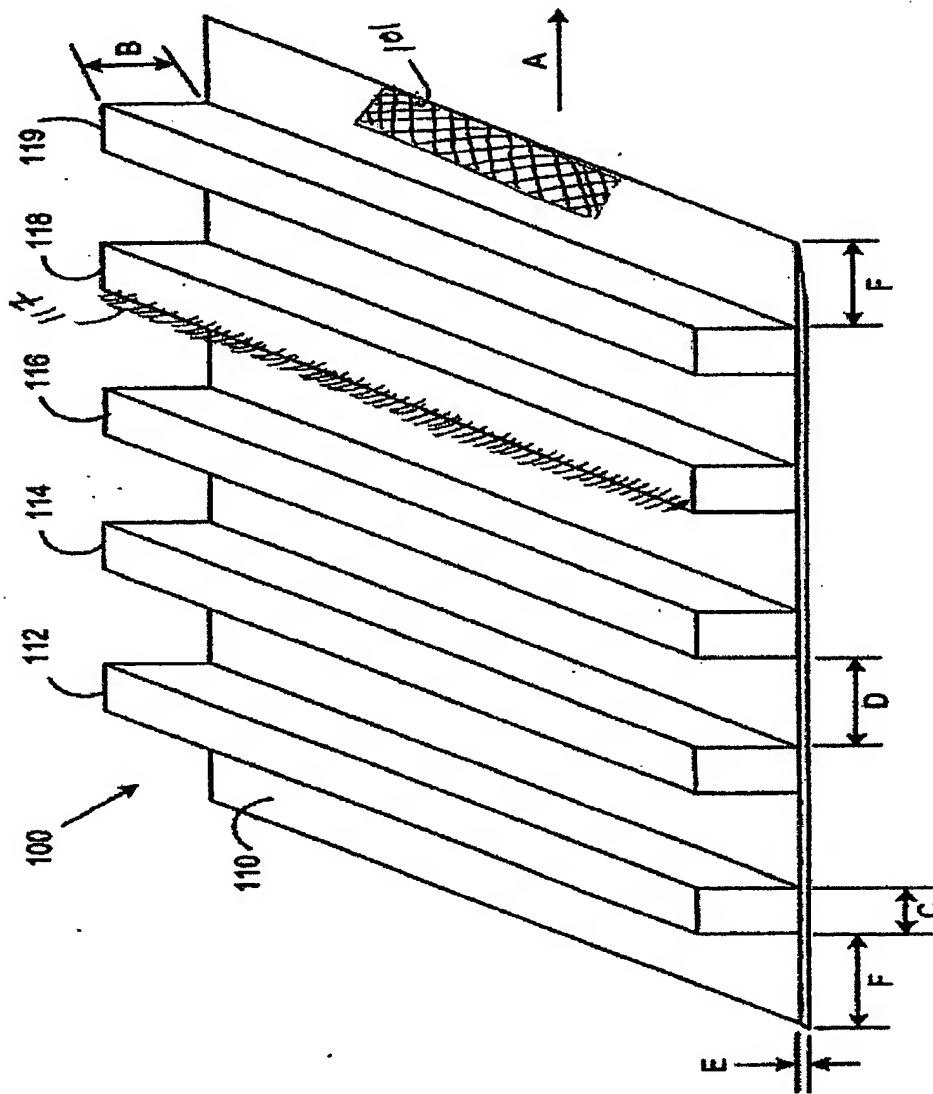


FIG. 2A

Additional features of the invention are discussed below in the Argument section of this Brief. This summary is not intended to supplant the description of the claimed subject matter as provided in the claims as recited in Appendix A, as understood in light of the entire specification.

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VI. Grounds of Rejection to Be Reviewed on Appeal

Whether claims 1-3, 5, 7-8, 10, 15 and 21 are patentable under 35 U.S.C. §102(b).

Whether claim 4 is patentable under 35 U.S.C. §103(a).

Whether claim 6 is patentable under 35 U.S.C. §103(a).

Whether claims 9, 13-14 and 17 are patentable under 35 U.S.C. §103(a).

Whether claims 11-12 are patentable under 35 U.S.C. §103(a).

Whether claim 18 is patentable under 35 U.S.C. §103(a).

Whether claim 19 is patentable under 35 U.S.C. §103(a).

Whether claim 20 is patentable under 35 U.S.C. §103(a).

VII. Argument

As discussed in detail below, Appellants respectfully submit that the final rejection of claims 1-15 and 17-21 does not meet the threshold burden of presenting a prima facie case of unpatentability. Accordingly, Appellants are entitled to grant of those claims. In re Oetiker, 24 U.S.P.Q.2d 1443, 1444 (Fed. Cir. 1992).

A Claims 1-3, 5, 7-8, 10, 15 and 21 are not Unpatentable under 35 U.S.C. § 102(b)

Claims 1-3, 5, 7-8, 10, 15 and 21 are in the case and stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated below.

To establish anticipation of the claims under § 102(b), the Examiner is required to show that every element or step of the claim is found in a single reference. "To anticipate a claim, a reference must disclose every element of the challenged claim and enable one skilled in the art to make the anticipating subject matter." PPG Indus., Inc. v.

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Guardian Indus. Corp., 75 F.3d 1558, 1566, 37 U.S.P.Q.2D (BNA) 1618, 1624 (Fed. Cir. 1996).

Independent claim 1 recites:

1. A cleaning apparatus for cleaning non-contact optical sensors in a paper handling device comprising:
 - a substrate sheet for feeding through a feed path of the paper handling device having a first surface and a second surface and having a substrate thickness, wherein the first surface has a front edge, a rear edge, a left edge and a right edge;
 - a first strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the first strip will vertically compress when drawn through a roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path;
 - a second strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the second strip will vertically compress when drawn through a roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path; and,
 - wherein,
 - the first strip is separated from the second strip in the direction of the feed path by a first distance; and
 - the first strip height is relatively large compared to the substrate thickness and the first strip height when partially decompressed is sufficiently large to extend below the feed path to engage the optical sensors. (emphasis added).

Starting on page 2 of the Office Action, The Examiner relies upon Beeson '865 as describing a narrow first strip. However, there is no roller nip described and no vertical decompression beyond a nip for cleaning. If there were roller nips in the cited reference, it would appear the solvent would splash on such rollers and not the print head described. As stated by the Examiner, the first strip described in Beeson '865 is a "tight-celled" foam sponge which Applicant respectfully submits does not meet the claimed limitations. Office Action at p. 7-8. For example, the positively claimed limitations require that the first strip partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path. It would appear that the much denser "tight-celled" foam taught by Beeson would not so decompress and thus does not meet every limitation of the claim. See Beeson '869 at Col. 5, lines 8-19. Furthermore, the second strip of material described in Beeson '865 is a lint-free felt.

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See Beeson '869 at Col. 5, lines 8-19. It appears that felt would not so decompress. Moreover, a felt pad as taught in Beeson '869 might not even compress through a nip as required by the present claim.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an anticipation rejection of claim 1. Additionally, Appellants respectfully submit that dependent claims 2-3, 5, 7-8, 10, 15 and 21 are patentable over the cited reference for at least the same reasons discussed with reference to the applicable independent claim and any intervening claims.

With regard to claim 5, the Examiner has not established that Beeson '869 teaches "the first strip of material comprises lint-free, lead-free, non-abrasive, open cell foam."

With regard to claim 7, Appellants respectfully submit that Beeson '869 does not teach or suggest a separate handle and that such limitation is not met simply by the substrate since that interpretation would give no meaning to the element.

Accordingly, Appellants respectfully submit that claims 2-3, 5, 7-8, 10, 15 and 21 are patentable over the cited reference and that the final rejection is in error and should be reversed.

B Claim 4 is not Unpatentable under 35 U.S.C. § 103(a)

Claim 4 is in the case and stands rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 6,353,233 to Kikuchi, et al. ("Kikuchi '233").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated below.

In rejecting a claim under 35 U.S.C. §103, the Examiner is charged with the initial burden for providing a factual basis to support the obviousness conclusion. *In re Warner*, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967); *In re Lunsford*, 375 F.2d 385, 148 USPQ 721 (CCPA 1966); *In re Freed*, 425 F.2d 785, 165 USPQ 570 (CCPA 1970). The Examiner is also required to explain how and why one having ordinary skill in the art would have been led to modify an applied reference and/or combine applied

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references to arrive at the claimed invention. *In re Ochiai*, 37 USPQ2d 1127 (Fed. Cir. 1995); *In re Deuel*, 51 F.3d 1552, 34 USPQ 1210 (Fed. Cir. 1995); *In re Fritch*, 972 F.2d 1260, 23 USPQ 1780 (Fed. Cir. 1992); *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). See *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. ___, 127 S.Ct. 1727, 1735 (2007).

Initially, Appellants respectfully submit that dependent claim 4 is patentable over the cited references for at least the reasons described above with reference to independent claim 1 and any intervening claims. Appellants respectfully submit that Beeson '865 teaches away from using open cell foam for the second strip and explicitly teaches using two different pad types. See Beeson '865, Col. 5, lines 8-20. Accordingly, it would not have been obvious to modify the second strip as suggested by the Examiner to also include open cell foam since the reference explicitly teaches away from the use of the same material. Appellants respectfully dispute any intended Official Notice in the rejection related to cited law regarding allegedly obvious modifications.

Appellants respectfully submit that Beeson '865 is not suitable for its intended purpose in a system having a feed path with roller nips since the solvent would be pressed out in the nip. Accordingly, it would not be obvious to make the combination suggested by the Examiner.

Furthermore, the apparatus of Kikuchi '233 teaches away from putting the bristles through a roller and thus teaches bristles parallel to the feed path and not perpendicular. Thus one of skill in the art would not look to Kikuchi '233 to modify Beeson '865.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claim 4 is patentable over the available cited references and that the final rejection is in error and should be reversed.

C Claim 6 is not Unpatentable under 35 U.S.C. § 103(a)

Claim 6 is in the case and stands rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

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Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated. Initially, Appellants respectfully submit that dependent claim 6 is patentable over the cited references for at least the reasons described above with reference to independent claim 1. Beeson '865 teaches using a page size device and thus appears to teach away from the alleged obvious configuration suggested by the Examiner.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claim 6 is patentable over the available cited reference and that the final rejection is in error and should be reversed.

D Claims 9, 13-14 and 17 are not Unpatentable under 35 U.S.C. § 103(a)

Claims 9, 13-14 and 17 are in the case and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated.

Initially, Appellants respectfully submit that dependent claims 9, 13-14 and 17 are patentable over the cited references for at least the reasons described above with reference to independent claim 1 and any intervening claims.

Appellants respectfully submit that Beeson '865 teaches away from using a first strip having a height is approximately twelve times the substrate thickness, since it explicitly teaches each pad having a height only twice the standard gap between the ink-jet head and substrate of only 1mm and even explicitly states that the Figures of Beeson '865 are exaggerated. Thus the figures are not to scale such that they should not be relied upon. See Beeson '865 at Col. 5, lines 38-48.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claims 9, 13-14 and 17 are patentable over the available cited reference and that the final rejection is in error and should be reversed.

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E Claims 11-12 are not Unpatentable under 35 U.S.C. § 103(a)

Claims 11-12 are in the case and stand rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated.

Initially, Appellants respectfully submit that dependent claims 11-12 are patentable over the cited references for at least the reasons described above with reference to independent claim 1 and any intervening claims.

Appellants respectfully submit that Beeson '865 teaches away from using semi-rigid vinyl or ABS substrate material since the reference describes using a cardstock weight backing sheet that is a single use item. See Beeson '865 at Col. 4, lines 65-67 and Col. 7, lines 50-62.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claims 11-12 are patentable over the available cited reference and that the final rejection is in error and should be reversed.

F Claim 18 is not Unpatentable under 35 U.S.C. § 103(a)

Claim 18 is in the case and stands rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 5,457,843 to Gelardi, et al. ("Gelardi '843").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated.

Initially, Appellants respectfully submit that dependent claim 18 is patentable over the cited references for at least the reasons described above with reference to independent claim 1. Appellants respectfully submit that Beeson '865 teaches away from using a triangular prism since it teaches a first strip for delivering a solvent using a

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rectangular pad. It seems clear that one of skill in the art would not look to deliver a solvent using the lower top surface area of a triangular prism. Accordingly, Appellants respectfully submit that Beeson '865 is not suitable for its intended purpose in a system having a triangular prism pad. Accordingly, it would not be obvious to make the combination suggested by the Examiner.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claim 18 is patentable over the available cited references and that the final rejection is in error and should be reversed.

G Claim 19 is not Unpatentable under 35 U.S.C. § 103(a)

Claim 19 is in the case and stands rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865") in view of U.S. Patent No. 4,055,029 to Kalbow ("Kalbow '029").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated.

Initially, Appellants respectfully submit that dependent claim 19 is patentable over the cited references for at least the reasons described above with reference to independent claim 1. Appellants respectfully submit that Beeson '865 teaches away from the combination since the apparatus of Kalbow '029 would have grooves parallel to the feed path if used that would result in swaths of the printhead not being cleaned. Accordingly, Appellants respectfully submit that Beeson '865 is not suitable for its intended purpose in a system having such a notched surface. Accordingly, it would not be obvious to make the combination suggested by the Examiner.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claim 19 is patentable over the available cited references and that the final rejection is in error and should be reversed.

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H Claim 20 is not Unpatentable under 35 U.S.C. § 103(a)

Claim 20 is in the case and stands rejected under 35 U.S.C. § 103(a) as allegedly being rendered obvious by U.S. Patent No. 5,589,865 to Beeson ("Beeson '865").

Appellants respectfully disagree with the rejection and urge its reversal for at least the reasons stated.

Initially, Appellants respectfully submit that dependent claim 20 is patentable over the cited references for at least the reasons described above with reference to independent claim 1. Appellants respectfully submit that Beeson '865 teaches away from using a triangular prism since it teaches a first strip for delivering a solvent using a rectangular pad. It seems clear that one of skill in the art would not look to deliver a solvent using the lower top surface area as claimed. Accordingly, Appellants respectfully submit that Beeson '865 is not suitable for its intended purpose in a system having a top surface as claimed. Accordingly, it would not be obvious to make the combination suggested by the Examiner.

Accordingly, Appellants respectfully submit that the Examiner has failed to establish a prima facie case for an obviousness rejection. Appellants respectfully submit that claim 20 is patentable over the available cited reference and that the final rejection is in error and should be reversed.

For at least the above stated reasons, Appellants respectfully submit that the final rejection as to claims 4, 6, 9, 11-14, and 17-20 is in error and should be reversed.

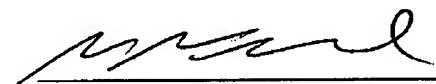
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IX. Conclusion

In Conclusion, Appellants respectfully submit that the final rejection of claims 1-15 and 17-21 is in error for at least the reasons given above and should, therefore, be reversed.

Respectfully submitted,



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VIII – CLAIMS APPENDIX
APPENDIX A

1. A cleaning apparatus for cleaning non-contact optical sensors in a paper handling device comprising:

a substrate sheet for feeding through a feed path of the paper handling device having a first surface and a second surface and having a substrate thickness, wherein the first surface has a front edge, a rear edge, a left edge and a right edge;

a first strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the first strip will vertically compress when drawn through a roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path;

a second strip of material having a first strip height and attached to the first surface of the substrate sheet and oriented perpendicular to the feed path, wherein the second strip will vertically compress when drawn through a roller nip and partially vertically decompress when exiting the roller nip in order to engage the optical sensors below the feed path; and, wherein,

the first strip is separated from the second strip in the direction of the feed path by a first distance; and

the first strip height is relatively large compared to the substrate thickness and the first strip height when partially decompressed is sufficiently large to extend below the feed path to engage the optical sensors.

2. The apparatus of claim 1, wherein,
the first surface is an upper surface and the second surface is a lower surface.

3. The apparatus of claim 2, wherein,
the first strip of material comprises open cell foam.

4. The apparatus of claim 3, wherein,

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the first strip of material is closer to the front edge of the substrate sheet than the second strip of material; and

the second strip of material comprises open cell foam and brush bristles.

5. The apparatus of claim 3, wherein,
the first strip of material comprises lint-free, lead-free, non-abrasive, open cell foam.

6. The apparatus of claim 1, wherein,
the substrate sheet has approximately the planar dimensions of a number 10 envelope.

7. The apparatus of claim 1, further comprising,
a leading edge handle on the substrate sheet.

8. The apparatus of claim 1, wherein,
the substrate sheet has approximately the planar dimensions of a letter sized sheet of paper and the first strip height is more than double the substrate thickness.

9. The apparatus of claim 1, wherein,
the first strip height is approximately twelve times the substrate thickness.

10. The apparatus of claim 1, wherein,
the first strip having a width that is relatively narrow compared to a diameter of a roller in order to allow the first strip to vertically decompress when exiting the roller nip.

11. The apparatus of claim 1, wherein,
the substrate comprises a semi-rigid vinyl material.

12. The apparatus of claim 1, wherein,

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the substrate comprises an ABS material.

13. The apparatus of claim 1, wherein,
the first strip having a first strip width; and wherein
the first distance is approximately five times the first strip width.

14. The apparatus of claim 13, wherein,
the first strip width is 0.5 inches.

15. The apparatus of claim 1, wherein,
the first strip has the shape of a rectangular prism.

17. The apparatus of claim 1, wherein,
the first strip height is approximately 0.75 inches, the first strip having a width of
0.5 inches; and
wherein the first distance is 2.5 inches.

18. The apparatus of claim 1, wherein,
at least one of the first and second strips has the shape of a triangular prism.

19. The apparatus of claim 1, wherein,
the first strip includes a top surface and has the shape of a rectangular prism
having at least one notch in the top surface.

20. The apparatus of claim 1, wherein,
the first strip includes a leading edge and has the shape of a rectangular prism
having an angled portion of the leading edge removed.

21. The apparatus of claim 1, wherein,

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the first strip having a width that is relatively narrow compared to the first distance in order to allow the first strip to vertically decompress when exiting the roller nip.

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Appendix IX – Evidence Appendix

None

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Appendix X – Related Proceedings Appendix

None

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